

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA; THE
COMMONWEALTHS OF
MASSACHUSETTS AND VIRGINIA; THE
STATES OF CALIFORNIA, DELAWARE,
CONNECTICUT, MARYLAND,
COLORADO, FLORIDA, GEORGIA,
ILLINOIS, INDIANA, HAWAII,
LOUISIANA, MICHIGAN, MONTANA,
NEW HAMPSHIRE, NEW MEXICO, NEW
YORK, NEVADA, TENNESSEE, NEW
JERSEY, RHODE ISLAND, OKLAHOMA,
WISCONSIN, NORTH CAROLINA,
MINNESOTA AND WASHINGTON, THE
CITY OF CHICAGO AND THE DISTRICT
OF COLUMBIA ex rel. ALLISON ZAYAS,

Plaintiff-Relator,

v.

ASTRAZENECA
BIOPHARMACEUTICALS, INC.,
ASTRAZENECA PLC, ASTRAZENECA LP,
and ASTRAZENECA PHARMACEUTICALS
LP,

Defendants.

CIVIL ACTION: 1-14-cv-01718

JOINT STIPULATION AND MOTION FOR DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(2) and the terms of the Settlement Agreement and Mutual Release, Relator Allison Zayas (“Relator”), by and through her undersigned counsel, and Defendants AstraZeneca LP and AstraZeneca Pharmaceuticals LP (“Defendants”), by and through their undersigned counsel (collectively the “Parties”), hereby stipulate and agree that all of Relator’s claims in this action are dismissed with prejudice. The Parties further stipulate and agree that the dismissal of claims in this action shall be without prejudice as to the United States, the Plaintiff States,¹ and the City of Chicago.

¹ The Plaintiff States in the Ninth Amended Complaint included the States or Commonwealths of California, Delaware, Florida, Georgia, Illinois, Hawaii, Indiana, Louisiana, Massachusetts, Michigan, New Mexico, Montana,

The Parties have conferred with representatives of the United States, the Plaintiff States, and the City of Chicago, and the United States, the Plaintiff States and the City of Chicago consent to the above dismissals.

WHEREFORE the Parties hereby move the Court for an order dismissing this action with prejudice as to Relator's claims against the Defendants, and without prejudice as to the United States', the Plaintiff States', and the City of Chicago's claims against the Defendants.

Dated: August 10, 2018

Respectfully submitted,

/s/ James J. Pepper

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